

ROBERT L. DELL ANGELO (SBN 160409)
 robert.dellangelo@mto.com
 ALLISON B. STEIN (SBN 72801)
 allison.stein@mto.com
 MUNGER, TOLLES & OLSON LLP
 350 South Grand Avenue, Fiftieth Floor
 Los Angeles, California 90071-1560
 Telephone: (213) 683-9100
 Facsimile: (213) 687-3702

DAVID H. FRY (SBN 189276)
 david.fry@mto.com
 ADAM I. KAPLAN (SBN 268182)
 adam.kaplan@mto.com
 MUNGER, TOLLES & OLSON LLP
 560 Mission Street, Twenty-Seventh Floor
 San Francisco, California 94105-2907
 Telephone: (415) 512-4000
 Facsimile: (415) 512-4077

Attorneys for Defendants
Avalanche Biotechnologies, Inc.,
Thomas W. Chalberg, Jr., Linda C. Bain,
Mark S. Blumenkranz, John P. McLaughlin,
Steven D. Schwartz and Paul D. Wachter

RICHARD W. GONNELLO (*pro hac vice*)
 rgonnello@faruqilaw.com
 MEGAN M. SULLIVAN (*pro hac vice*)
 msullivan@faruqilaw.com
 KATHERINE M. LENAHA (*pro hac vice*)
 klenahan@faruqilaw.com
 FARUQI & FARUQI, LLP
 685 Third Avenue, 26th Floor
 New York, NY 10017
 Telephone: (212) 983-9330
 Facsimile: (212) 983-9331

BENJAMIN HEIKALI (SBN 3074466)
 bheikali@faruqilaw.com
 FARUQI & FARUQI, LLP
 10866 Wilshire Boulevard, Suite 1470
 Los Angeles, CA 90024
 Telephone: (424) 256-2884
 Facsimile: (424) 256-2885

Attorneys for Lead Plaintiff Arpan Bachhawat
and Plaintiff Srikanth Koneru

Additional Counsel on Signature Page

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

In re AVALANCHE BIOTECHNOLOGIES
 SECURITIES LITIGATION

Master File No. 15-cv-03185-JD

CLASS ACTION

**JOINT NOTICE OF SETTLEMENT
 AND STIPULATION**

Judge: Hon. James Donato
 Ctrm: 11

This Document Relates To: All Actions

1 WHEREAS, a hearing on the Avalanche Defendants’ Motion to Stay Discovery in a State
 2 Court Action Pursuant to the Securities Litigation Uniform Standards Act of 1998 (Dkt. 122) (“Stay
 3 Motion”), and the Underwriter Defendants’ joinder therein (Dkt. 125), is currently scheduled for
 4 March 23, 2017;¹

5 WHEREAS, Defendants’ reply brief in support of their Motion to Dismiss First Amended
 6 Complaint is due on March 27, 2017;

7 WHEREAS, a hearing on the Avalanche Defendants’ Motion to Certify a Class Before the
 8 Court Adjudicates the Pending Motion to Dismiss (Dkt. 126) (“Certification Motion”) is currently
 9 scheduled for March 30, 2017;

10 WHEREAS, Lead Plaintiff Arpan Bachhawat and Plaintiff Srikanth Koneru (“Plaintiffs”)
 11 and Defendants (collectively, the “parties”) and Beaver County Employees Retirement Fund
 12 (“Beaver County”), the lead plaintiff in *In re Avalanche Biotechnologies Shareholder Litigation*,
 13 Civ. 536488 (San Mateo Superior Court) (the “state action”), have reached a global agreement in
 14 principle for a class action settlement of this action and the state action;

15 WHEREAS, the parties and Beaver County expect to document the terms of the class action
 16 settlement and the plan for effectuation of that settlement;

17 NOW, THEREFORE, IT IS HEREBY STIPULATED AND AGREED among the parties,
 18 through their respective counsel, to the entry of an Order providing that:

19 1. Defendants’ Motion to Dismiss First Amended Complaint, the Avalanche
 20 Defendants’ Stay Motion, and the Avalanche Defendants’ Certification Motion shall be withdrawn
 21 without prejudice;

22 2. The hearings on the Avalanche Defendants’ Stay Motion and Certification Motion
 23 will be taken off calendar;

24 3. All further proceedings in this case will be stayed; and

25 ¹ The Avalanche Defendants are Avalanche Biotechnologies, Inc., Thomas W. Chalberg, Linda C.
 26 Bain, Mark S. Blumenkranz, John P. McLaughlin, Steven D. Schwartz, and Paul D. Wachter,
 27 collectively. The Underwriter Defendants are Jefferies LLC, Cowen and Company, LLC, Piper
 28 Jaffray & Co., and William Blair & Company, L.L.C., collectively. Defendants are the Avalanche
 Defendants and the Underwriter Defendants, collectively.

1 Dated: March 17, 2017

By: /s/ Richard W. Gonnello

Richard W. Gonnello

3 FARUQI & FARUQI, LLP
4 Richard W. Gonnello (*pro hac vice*)
5 Katherine M. Lenahan (*pro hac vice*)
6 Megan M. Sullivan (*pro hac vice*)
7 685 Third Avenue, 26th Floor
8 New York, NY 10017
9 Telephone: 212-983-9330
10 Facsimile: 212-983-9331
11 Email: rgonnello@faruqilaw.com
12 klenahan@faruqilaw.com
13 msullivan@faruqilaw.com

10 FARUQI & FARUQI, LLP
11 Barbara A. Rohr (SBN 273353)
12 10866 Wilshire Boulevard, Suite 1470
13 Los Angeles, CA 90024
14 Telephone: 424-256-2884
15 Facsimile: 424-256-2885
16 Email: brohr@faruqilaw.com

14 *Attorneys for Lead Plaintiff Arpan Bachhawat and*
15 *Plaintiff Srikanth Koneru*

16 * * *

17 Pursuant to Civil Local Rule 5-1(i), I hereby attest that all signatories have concurred with
18 this filing.

20 /s/ Adam I. Kaplan

Adam I. Kaplan

22 THE COURT FINDS GOOD CAUSE EXISTS FOR THE PARTIES' STIPULATION AND ON
23 THAT BASIS THE FOREGOING STIPULATION IS APPROVED AND IS SO ORDERED.

24 DATED: _____

27 _____
28 HONORABLE JAMES DONATO
UNITED STATES DISTRICT JUDGE